

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CONNECTU LLC,
Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO
SAVERIN, DUSTIN MOSKOVITZ,
ANDREW MCCOLLUM, CHRISTOPHER
HUGHES, and FACEBOOK, INC.,
Defendants.

MARK ZUCKERBERG, and
FACEBOOK, INC.,
Counterclaimants,

v.

CONNECTU LLC,
Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,
Additional Defendants on Counterclaims.

**ASSENTED-TO MOTION FOR A SHORT EXTENSION OF TIME UNTIL
MARCH 29, 2006 BY WHICH FACEBOOK DEFENDANTS ARE TO RESPOND
TO (1) CONNECTU'S RE-ARGUMENT ON DOCKET #37 AND (2) DOCKET #148**

Defendants Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, Christopher Hughes, and Facebook, Inc. (collectively, "Facebook Defendants") file this assented-to motion for a short extension of time until Wednesday, March 29, 2006 by which they are to respond:

- (1) ConnectU's re-argument at the March 3, 2006 hearing of its Motion to Compel the Production of Mirror Images of Defendants' Hard Drives and Other Electronic Memory Devices and Documents Created After May 21, 2004 (Docket #37); and
- (2) ConnectU's Summary of March 3, 2006 Status Report and Requests Related to Discovery Permitted By November 18, 2005 Electronic Order" (Docket #148).

In support of this motion for a short extension, Facebook Defendants state as follows:

1. At the March 3, 2006 hearing before this Court on six pending discovery motions, ConnectU offered “gratuitous re-argument”¹ with respect to its previously-argued Motion to Compel the Production of Mirror Images of Defendants’ Hard Drives and Other Electronic Memory Devices and Documents Created After May 21, 2004 (Docket #37).

2. In light of this “gratuitous re-argument,” the Court allowed Facebook Defendants to reply in writing to ConnectU’s re-argument by Friday, March 24, 2006.

3. On March 10, 2006, without seeking leave of court, ConnectU filed its “Summary of March 3, 2006 Status Report and Requests Related to Discovery Permitted By November 18, 2005 Electronic Order” (Docket #148).

4. On March 15, 2006, counsel for Facebook Defendants received a copy of the transcript from March 3, 2006 hearing.

5. Due to the length of the transcript from the March 3, 2006 hearing, the fact that transcript was not received by Facebook Defendants until March 15, 2006, and that ConnectU’s filed its “summary” on March 10, 2006, Facebook Defendants respectfully request a short extension of three business days to file their responsive papers by Wednesday, March 29th, which is two weeks from the date when they received the hearing transcript.

6. This motion is not being brought for any improper purpose or delay.

7. Counsel for ConnectU, Inc. has assented to this extension of time.

WHEREFORE, Facebook Defendants respectfully request that the Court enter an Order extending until Wednesday, March 29, 2006 the date by which they are allowed to respond to (1) ConnectU’s re-argument on Docket #37 and (2) Docket #148.

¹ See March 3, 2006 Hearing Transcript, 172:4.

Dated: March 17, 2006

Respectfully submitted,

DEFENDANTS ZUCKERBERG, MOSKOVITZ,
MCCOLLUM, HUGHES, and FACEBOOK, INC.

By their Attorneys,

/s/ Jeremy P. Oczek

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Certificate Pursuant To Rule 7.1

I certify that counsel for the parties have conferred in an attempt to resolve or narrow the issues presented by this motion, and that counsel for plaintiff ConnectU, Inc., John F. Hornick, has assented to this motion.

/s/ Jeremy P. Oczek